

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN**

Civil Action No. 2:20-CV-1353

ADELANA AKINDES, et al.,  
Plaintiffs,

v.

CITY OF KENOSHA, et al.,  
Defendant.

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**MOTION TO WITHDRAW AS COUNSEL**

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Attorneys E. Milo Schwab of Ascend Counsel, LLC and Kimberley Cy. Motley of Motley Legal Services, respectfully move the Court for an Order permitting their withdrawal as counsel for Plaintiffs Danica Gagliano-Deltgen and Victor Garcia (the “Remaining Plaintiffs”) for the following reasons:

1. Counsel and the Remaining Plaintiffs have not been able to effectively communicate for a period of time which renders Counsel unable to effectively represent the interests of the Remaining Plaintiffs.
2. Despite numerous efforts via phone calls, text messages, and emails, Attorneys Schwab and Motley have been unable to reach the Remaining Plaintiffs for several months.
3. Without effective communication, Attorneys Schwab and Motley have been unable to engage in the discovery process and have determined that they can no longer be confident that they are representing their clients’ interests without any communication or direction.

Accordingly, Attorneys E. Milo Schwab and Kimberley Cy. Motley respectfully request that this court grant leave to withdraw as counsel for Plaintiffs Danica Gagliano-Deltgen and Victor Garcia.

Respectfully submitted this 27th day of July 2022.

Ascend Counsel, LLC

/s/ E. Milo Schwab

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/s/ Kimberley Cy. Motley  
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**CERTIFICATE OF SERVICE**

I hereby certify that on this 27th day of July 2022, I electronically served the following MOTION TO WITHDRAW AS COUNSEL via the ECF electronic filing system on the following:

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/s/ E. Milo Schwab

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